

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

THE BAIL PROJECT, INC.,)	
)	
Plaintiff,)	
)	
v.)	No.: 1:22-cv-862-JPH-MJD
)	
COMMISSIONER, INDIANA)	
DEPARTMENT OF INSURANCE, in her)	
official capacity,)	
)	
Defendant.)	

DEFENDANT'S PRELIMINARY WITNESS AND EXHIBIT LIST

Defendant, Commissioner of the Indiana Department of Insurance, by
counsel, submits her preliminary witness and exhibit list.

Witnesses

1. Steven Embree, Indiana Department of Insurance. He may be contacted through defense counsel.
2. Samantha Walters, Bail/Recovery Agent and Adjuster Licensing Supervisor of the Indiana Department of Insurance. She may be contacted through defense counsel.
3. Other yet to be identified representatives from the Department of Insurance would may have information about the bail regulatory system, including the regulation of charitable bail organizations. They may be contacted through defense counsel.

4. David Gaspar, a representative of The Bail Project. He may be contacted through plaintiff's counsel.
5. Other yet to be identified representatives from the Bail Project. They may be contacted through plaintiff's counsel.
6. Any witness identified by plaintiff on initial disclosures or plaintiff's witness list.
7. Any person necessary for impeachment or rebuttal.

Exhibits

1. All documents produced by plaintiff in this matter.
2. All depositions taken in this matter, including exhibits.
3. All documents attached to any filings in this matter by plaintiff or defendant.
4. Documents, including forms and applications, that are publicly available on the Department of Insurance's website relating to its regulation of the bail agents, recovery agents, and charitable bail organizations.
5. Any declaration or affidavit filed in this matter.
6. The pleadings in this matter, and all exhibits or attachments.
7. Any and all responses to discovery requests, including responses to discovery conducted for purposes of the request for a preliminary injunction.
8. All documents identified in any party's initial disclosures.
9. Any and all documents needed for impeachment and/or rebuttal purposes.

10. Any documents identified in Plaintiff's exhibit lists.

11. Publicly available information about the Bail Project.

The Commissioner reserves the right to amend and/or supplement her preliminary witness and exhibit list as discovery progresses.

Respectfully submitted,

THEODORE E. ROKITA
Attorney General of Indiana

Date: July 20, 2022

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